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Richard W. Revels, Jr. rwrevels@liskow.com

August 17, 2007

Honorable James H. Welsh Commissioner of Conservation Office of Conservation P. O. Box 94275 Baton Rouge, LA 70804-4275

Re:

Operculinoides 1-5 Zone, Reservoir A

Bayou Sale Field

St. Mary Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **SWIFT ENERGY COMPANY** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the Operculinoides ("Operc") 1-5 Zone, Reservoir A, in the Bayou Sale Field, St. Mary Parish, Louisiana:

- 1. To establish rules and regulations and to create a single drilling and production unit for the exploration for and production of gas and condensate from the Operc 1-5 Zone, Reservoir A, in the Bayou Sale Field, St. Mary Parish, Louisiana, said unit to be designated OPERC 1-5 RA SUA, as shown on the plat attached hereto and made a part hereof.
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit with each tract sharing in unit production on a surface acreage basis of participation.
- 3. To provide that any wells drilled to the Operc 1-5 Zone, Reservoir A, within or outside the unit created herein, should be located in accordance with the provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
- 4. To provide that the Commissioner of Conservation should be authorized to reclassify the Operc 1-5 Zone, Reservoir A, in the Bayou Sale Field, by supplemental order without the necessity of a public hearing if the producing characteristics of such reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.
 - 5. To consider such others matters as may be pertinent.

The Operculinoides 1-5 Zone, Reservoir A, in Bayou Sale Field, is hereby defined as being the stratigraphic equivalent of that gas and condensate bearing zone having a top of 13,435 feet (electrical log measurement) as seen in the Texaco, Inc. – State Lease 329 East Cote Blanche Bay No. B-25 Well located in Township 17 South, Range 9 East, and a base of 14,100 (electrical log measurements) as seen in the Superior Oil Company – State Lease 340 Bayou Sale No. 1 Well located in Township 16 South, Range 9 East, all in St. Mary Parish, Louisiana.

Any pertinent data, including well logs, not available at the Office of Conservation, may be obtained **AT THE COST OF THE REQUESTING PARTY** from David Comeaux of Leon Comeaux & Associates, P. O. Box 53922, Lafayette, Louisiana 70505, Telephone No. 337/233-9839.

Pursuant to the Rules of Procedure, a pre-application conference was held on August 16, 2007, in Lafayette, Louisiana, at which the parties named on the attached list were in attendance. The conference was opened by representatives of the applicant who explained the basis for the applicant's proposal. Questions were asked and answered. No counterplans were presented, and the conference was adjourned.

Attached hereto and made a part hereof is a plat outlining the applicant's proposal, the conference attendance list and a list of the names and addresses of the Interested Owners, Represented Parties, and Interested Parties to whom a copy of this application is being mailed. Pursuant to the Revised Rules of Procedure, such plat (being the same plat attached to the preapplication notice dated July 24, 2007) and list of parties are being furnished ONLY to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation; however, the plat and/or list of parties will be furnished to any party requesting copies. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed is our check in the amount of \$755.00 made payable to the Office of Conservation submitted on behalf of the applicant representing the hearing application fee.

Very truly yours,

RWRjr/dbf Attachments

Richard W. Revels, Jr.

cc: Mr. Richard Hudson, Lafayette District Office of Conservation cc: Interested Owners, Represented Parties and Interested Parties

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